

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankr. No. 20-20081 JAD
RENEE R. KLINE,)	
)	Chapter 13
)	
Debtor.)	
)	Docket No. 70
WILMINGTON SAVINGS FUND)	Related to Docket No.
SOCIETY, FSB, d/b/a)	
CHRISTIANA TRUST,)	
Movant,)	Hearing Date & Time:
)	
vs.)	Claim No. 8-1
)	
RENEE R. KLINE,)	
)	
Respondent.)	

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Renee R. Kline, by and through her attorney, who respectfully represents the following:

1. On or about January 9, 2020, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Wilmington Savings Fund Society, filed a Notice of Mortgage Payment Change on September 19, 2023. The monthly mortgage payment of **\$483.56** is being **increased** to **\$493.04** effective **11/1/2023**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Date: 9/28/2023

Respectfully submitted.
/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtor
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2403 Sidney Street, Suite 208
Pittsburgh, PA 15203
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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 28th day of September, 2023, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Wilmington Savings
Attn: Charles Griggin Wohlrab, Esquire
bkecf@friedmanvarolo.com

By: /s/ Rodney D. Shepherd
Rodney D. Shepherd
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